

system identifies the music CD 101 inserted in the computer's CD drive through a comparison between information on the music CD 101 and information extracted from CD-ROM 102. Column 3, lines 23-29. The information of the music CD 101 used in this comparison is "the TOC [Table-of-Contents] data [] read from the read-in area of the music CD storing sound data." Column 3, lines 24-25 (insertion added). The data included in the TOC of the music data includes "the total performance time, total number of music pieces, and performance time of each music piece." Column 8 -> 15, lines 48-49. This time information is in multiple unites, that is, in minutes, seconds, and frame number. Column 18, lines 42-53. Unlike the claimed invention, however, Kajiyama does not convert this information expressed in multiple units, into 11 "a start time in the form of exactly one time unit," such as seconds, for example. Instead, the CD playback device 201 in Kajiyama operates according to the multiple time unit address discussed above, without any conversion of the multiple time units. The portion of Kajiyama relied on by the Examiner to demonstrate this feature of 15 claim 5, namely, Figure 3 and column 4, lines 30-41, makes absolutely no mention of this converting feature recited in claim 5.

17 Another distinction between claim 5 and Kajiyama is that Kajiyama 18 does not teach a start time "substantially corresponding to a playing time of the 19 recording medium from a beginning of a program area to a beginning of an addressed 20 title." For example, in the claimed invention, a start time of 1000 seconds assigned to a particular title does not mean that the playback of this title takes 1000 seconds; it means that the title is located in the recording medium at the location that is arrived at 1000 seconds after playing the recording medium from the beginning of the program area, regardless of how many titles are contained in those preceding 1000 seconds. Although the TOC in CD 101 described by Kajiyama stores the performance time of each music piece, this performance time cannot be used by itself as a start time because it is the time it takes particular song to be played. Since it is not measured from a beginning of a program area, the performance time cannot be used by itself to locate the track on which the song is located. Indeed, in order to locate a track where a song begins using the performance times in Kajiyama, one would have to rely on a cumbersome process that is not needed in the claimed invention. In particular, the individual playback times of all the songs prior to the desired song would need to be

added up in order to arrive at a location on CD 101 for the desired song. The claimed invention avoids this wasteful use of limited processing resources by assigning to the tile on the recording medium an address in the form of a start time measured from a beginning of a program area, so that the location of the title is revealed by the start time itself without requiring any summing of multiple playback times.

In view of this discussion, withdrawal of the reaction of claims 5-9 is respectfully requested.

Notwithstanding the above, Applicants submit that claim 7 is patentable over Kajiyama for at least the following reason. The synchronization of text, audio, and video is claimed by the Examiner to include a pause time. Applicants do not concede that this assertion is true, but even if it were so, it would still not address every limitation of the claim. In particular, claim 7 recites that if a pause is detected at the beginning of the title, then a pause time is determined and added to the start time. Nothing in what the Examiner says on those portions of Kajiyama on which he relies demonstrates the unpatentability of this claim feature.

Applicants assert that the present invention is new, non-obvious, and useful. Consideration and allowance of the claims are requested.

Respectfully submitted,

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Dated: 6/18/03

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